

REMARKS

Claims 1 - 30 are pending in the present application.

Applicants submitted several information disclosure statements (IDSs), each of which included a PTO-1449 that lists references for consideration by the Office. More specifically, Applicants submitted IDSs on the following dates:

- (a) 3 MAY 2002;
- (b) 1 APR 2003; and
- (c) 7 JAN 2005.

The Office Action does not include a copy of the PTO-1449s acknowledging that the Office considered the references. Applicants respectfully request that with the next communication from the Office, the Examiner **include a copy of the PTO-1449s acknowledging that the Office considered the references.**

Applicants are amending the claims to avoid recitals of "means for" and "steps of." None of the amendments is being made in response to a rejection, and none of the amendments is intended to limit the scope of any term of any of the claims. Thus, the doctrine of equivalents should be available for all of the terms of all of the claims.

In section 2 of the Office Action, claims 1 – 30 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,718,023 to Zolotov (hereinafter "the Zolotov patent"). Applicants are traversing this rejection.

Claim 1 provides an apparatus for processing data records. The apparatus includes, *inter alia*, (i) a receiver that receives data records of a plurality of different types, each type having a different predetermined format, (ii) a plurality of type-specific function libraries, each library having functions associated with each of the particular types of data record, (iii) a receiver that receives instructions indicative of the particular type(s) of data records to be received and indicative of which particular functions are to be performed on the data records to be received, (iv) a reader that reads contents of the

type-specific library(ies) associated with the particular type of data records to be received and (v) a processor that processes received data records according to the particular functions to be performed.

The Zolotov patent is concerned with building Call Data (Detail) Records, rather than processing the records. In the Zolotov patent, information from different data sources, which may be different types of networks, is collected using at least one probe, and stored. At col. 3, lines 16 – 25, the Zolotov patent explains that the collecting step may include picking put call-related events (the pre-CDRs), which may involve parsing data present in a number of different formats (protocols). All the pre-CDRs in one particular protocol are stored in one database (the CDR database) and then an Integrated CDR is formed from the different CDRs relating to the same call (see col. 3, lines 38 – 58). Nevertheless, in the Zolotov patent, the output is a CDR (or Integrated CDR). There is no discussion of the further processing of CDRs in the Zolotov patent.

The Office Action suggests that the Zolotov patent, at col. 2, lines 10 – 12 and col. 6, lines 11 – 20, discloses means for receiving data records of a plurality of different types. Applicants respectfully disagree.

The Zolotov patent, at col. 2, lines 10 – 12 and col. 6, lines 11 – 20, describes the collection of input information concerning a particular call from a plurality of data sources (which may be in different protocols), but not to the receiving of Call Detail Records. As explained at col. 2 lines 42 -65, the call information that is extracted comes from, for example, a bearer and a source of signalling data associated with the bearer, such that the data may be, for example, bearer classification, DTMF, Quality of Service parameters, etc. The call information does not constitute completed Call Detail Records. Indeed, the Office Action acknowledges this where it states that the information may be voice and data for example, but does not realize that therefore such information is not a Call Detail Record, but is a precursor to a Call Detail Record. Thus, Applicants respectfully submit that the Zolotov patent does not disclose a receiver that **receives data records of a plurality of different types**, each type having a different predetermined format, as recited in claim 1.

The Office Action suggests that the Zolotov patent, at FIG. 6, col. 3, lines 35 – 37, and col. 3, lines 50 – 53 discloses a plurality of type-specific function libraries. Applicants respectfully disagree.

In the Zolotov patent, the elements shown in Fig.6 and described in col. 3 lines 35-37 are not even the CDR databases suggested by the Office Action, but the pre-CDRs, i.e. the call information collected as described above. CDRs are shown in Fig. 7 as element 89. Thus, the Zolotov patent does not describe type-specific libraries of functions. Accordingly, Applicants submit that the Zolotov patent does not disclose **a plurality of type-specific function libraries**, each library having functions associated with each of the particular types of data record, as recited in claim 1.

The Office Action suggests that the Zolotov patent, at col. 3, lines 27 – 37 and col. 3, lines 40 – 67, discloses means for processing received data records according to the particular functions to be performed. Applicants respectfully disagree.

The Zolotov patent, at col. 3, lines 27 – 37 and col. 3, lines 40 – 67, discloses processing the collected information regarding call events to form CDRs, not to process received CDRs, since the Zolotov patent does not describe receiving CDRs. Furthermore, the processing means in the Zolotov patent cannot process anything according to particular functions read from type-specific function libraries, since, as explained above, such libraries do not exist in the Zolotov patent. Thus, Applicants respectfully submit that the Zolotov patent does not disclose a processor that **processes received data records** according to the **particular functions** to be performed, as recited in claim 1.

For the several reasons provided above, Applicants respectfully submit that the Zolotov patent does not disclose all of the elements of claim 1. Furthermore, the Office Action, at the bottom of page 3, acknowledges that the Zolotov patent does not specifically teach receiving instructions indicative of the particular type(s) of data records to be received and indicative of which particular functions are to be performed on the data records to be received. Immediately thereafter, the Office Action states that therefore, "it would have been obvious ... to have the system provides (sic) some instruction that can be assigned to each type of data record ...in order to enhance the efficiency by avoiding errors and fault processing." However, the Office Action has not indicated how the Zolotov patent suggests the desirability of such a feature, and more particularly, the Office Action has not indicated where the Zolotov patent suggests receiving instructions indicative of the particular type(s) of data records to be received and indicative of which particular functions are to be performed on the data records to be

received, as recited in claim 1. Thus, the Office Action has **not made out a *prima facie* case of obviousness** for purposes of a section 103(a) rejection of claim 1.

For the reasoning provided above, Applicants respectfully submit that claim 1 is patentable over the Zolotov patent.

Claims 2 – 13 depend from claim 1. At least because of this dependency, claims 2 – 13 are also patentable over the Zolotov patent.

Claim 14 includes recitals similar to those of claim 1, as described above. Thus, claim 14, for reasoning similar to that provided in support of claim 1, patentable over the Zolotov patent.

Claims 15 – 30 depend from claim 14. At least because of this dependency, claims 15 - 30 are also patentable over the Zolotov patent.

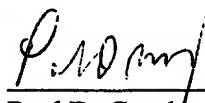
Applicants respectfully request reconsideration and withdrawal of the section 103(a) rejection of claims 1 – 30.

In view of the foregoing, Applicants respectfully submit that all claims presented in this application patentably distinguish over the prior art. Accordingly, Applicants respectfully request favorable consideration and that this application be passed to allowance.

Respectfully submitted,

Date

12/15/05



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